

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

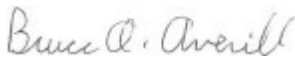



Office of Pesticide Programs

MEMORANDUM

11/25/2019

SUBJECT: Product Chemistry Review for **Deadpool** EPA Reg. No.: **777-RGI**

FROM: Bruce A Averill 
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen P. Hicks, Team Leader 
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Product Science Branch
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TO: Jacqueline Hardy, PM Team 34 / Lorena Rivas
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: Reckitt
Benckiser LLC
Action code: A540
Agency Due Date:
12/2/2019
DP No.: 453883
Submission No.: 1035833
E-Sub No.: 39954
Classification: EP
Process: Nonintegrated
system
Pesticide type: Bactericide

MRID(s): 50818101, 50818102, 50818103, 50818104, 50818105, 50818106, 50818107,
50818108, 50818109, 50818110, 50818111

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
069142	68424-85-1	Alkyl dimethyl benzyl ammonium chloride (C12-18)	3.71
128929	79-33-4	L-lactic acid	9.99
021801	77-92-9	Citric acid	5.00
		Other Ingredients	81.30
		Total	100%

I. BACKGROUND

The Registrant, Reckitt Benckiser LLC, has submitted an application for pesticide registration for their product: Deadpool, EPA Reg. No. 777-RGI.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (6/7/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (6/7/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF BASIC, (6/7/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (6/7/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments:		

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)	Nominal		Upper limit	Lower limit	
Alkyl dimethyl benzyl ammonium chloride (C12-18)	3.71		3.83	3.59	
L-lactic acid	9.99		10.49	9.49	
Citric acid	5.00		5.25	4.75	
	YES		NO	N/A	
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>		<input type="checkbox"/>	X	

3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings

The CSF for the proposed basic formulation (dated 6/7/2019) is acceptable. The certified limits for all ingredients agree with 40 CFR §158.350. All ingredients have been cleared for use in pesticide formulations. Percentages on label match composition of product.

V. Conclusion

The registrant has satisfied the CSF requirements for registration of a new basic formulation of EPA Reg. No. **777-RGI**. EPA approves said CSF.

VI. Table A:**Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50818101
830.1600	Description of materials	Acceptable	50818101
830.1620	Description of production process	Acceptable	50818101
830.1650	Description of formulation process	Acceptable	50818101
830.1670	Discussion of formation of impurities	Acceptable	50818101
830.1700	Preliminary analysis	Acceptable	50818101
830.1750	Certified limits	Acceptable	50818101
830.1800	Enforcement analytical method	Acceptable	50818101
830.1900	Submittal of samples	Acceptable	50818101

VII. Table B: Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Blue	Acceptable	50818102
830.6303	Physical state	liquid	Acceptable	50818102
830.6304	Odor	Not required for end use product	Waived	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Waived	N/A
830.6314	Oxidation/Reduction	No oxidizer/reducer present	Acceptable	50818102
830.6315	Flammability	Product is not potentially flammable	Acceptable	50818102
830.6316	Explodability	Product does not contain explosive ingredients	Waived	N/A
830.6317	Storage stability	0% loss after 14 days at 54C	Acceptable	50818102
830.6319	Miscibility	Product not mixed with organic solvents	Waived	N/A
830.6320	Corrosion characteristics	0% loss after 14 days at 54C	Acceptable	50818102
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Waived	N/A
830.7000	pH	2.56	Acceptable	50818102
830.7050	UV/Visible absorption	Not required for MUP or EP	Waived	N/A
830.7100	Viscosity	2.12 cP	Acceptable	50818102
830.7200	Melting point	Not required for MUP or EP	Waived	N/A
830.7220	Boiling point	Not required for MUP or EP	Waived	N/A
830.7300	Density/relative	1.0489 g/mL	Acceptable	50818102
830.7370	Dissociation constants in water	Not required for MUP or EP	Waived	N/A
830.7520	Particle size	Not required for MUP or EP	Waived	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Waived	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Waived	N/A

830.7950	Vapor pressure	Not required for MUP or EP	Waived	N/A
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